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TA-15-313, and TA-22-52

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**Annual MSGP No Exposure Exclusion Training
for TA-9-28, TA-14-23, TA-15-313, and TA-22-52
RR 14300**

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REVISION HISTORY

Revision	Effective Date	Action	Description
A	03/17/2021	New	Initial release.
B	10/27/2021	Minor Revision	Corrected RR number from 14330 to 14300. Updated contact information on slides.

**Annual MSGP No Exposure Exclusion Training
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Multi-Sector General Permit Annual “No Exposure Exclusion” Training

For TA-9-28, TA-14023, TA-15-313, and
TA-22-52

WFO-TRN-453, Rev B
UTrain RR 14300

LA-UR-21-28288



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Slide 2

Why Are You Taking This Training?

- EPA's Multi-Sector General Permit (MSGP) for Industrial Stormwater Discharges Requires Annual Training
 - Training applies to:
 - Employees who work at TA-9-28, TA-14-23, TA-15-313 and TA-22-52 and who move equipment or vehicles, metal, debris and other pollutants like oil, fuel, etc. outside; or who work outside with industrial materials exposed to stormwater
 - Employees responsible for implementing activities necessary to meet the conditions of the permit
 - * Deployed Environmental Professionals (DEPs) or other personnel conducting stormwater inspections and visual assessments, identifying corrective actions, writing Storm Water Pollution Prevention Plan (SWPPP) revisions, etc.
 - * Personnel installing stormwater controls
 - * Managers responsible for signing inspections, plans or reports



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Training Objectives

- Overview of “No Exposure Exclusion” at TA-9-28, TA-14-23, TA-15-313 and TA-22-52
- Become familiar with specific stormwater pollutants and controls at TA-9-28, TA-14-23, TA-15-313 and TA-22-52
- Know who to call if issues arise (see the last two slides of this presentation)



Slide 4

What Does “No Exposure” Mean?

- A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff.
 - Industrial materials and activities include, but are not limited to:
 - material handling equipment or activities,
 - industrial machinery,
 - raw materials,
 - intermediate products,
 - by-products,
 - final products, or
 - waste products.
 - Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, by-product, final product or waste product.



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Benefits of Retaining “No Exposure”

- Retaining “No Exposure” reduces regulatory liability and operating costs
- EPC-CP personnel will conduct inspections periodically to ensure compliance
- Must complete “No Exposure” certification form every 5 years and submit the original completed form to EPC-CP
- If a facility loses its “No Exposure” status by allowing pollutants (including sediment) to come in contact with storm water, the following is required
 - Development of a SWPPP
 - Monthly or quarterly inspections
 - Follow-up for identified corrective actions is required whether a facility in “no exposure or not”.



What is a “No Exposure Exclusion”?

- Facilities subject to NPDES permitting for “stormwater discharges associated with industrial activity” [40 CFR 122.26(b)(14)] may be able to get relief from the permitting requirements if they can show that the site has no exposure of industrial materials to stormwater.
- To be eligible for the “No Exposure” exclusion, the operator must:
 - Provide storm-resistant shelter for all industrial material and activities;
 - Have the Deployed Environmental Professional or a representative from the EPC-CP Stormwater Permitting and Compliance Team complete the *Conditional “No Exposure Exclusion for Storm Water Runoff from Sites with Industrial Activity* form;
 - Complete and sign the *No Exposure Certification* form for exclusion from EPA’s MSGP and submit it to the MSGP Program Manager;
 - Allow a representative from EPC-CP to inspect the facility to determine compliance with “no exposure” conditions;
 - Resubmit the signed certification to EPC-CP every five years; and
 - Allow EPA to release any inspection reports to the public. [40 CFR 122.26(g)]
 - Allow EPA to inspect the facility to determine compliance with the “no exposure” conditions.”



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Industrial Facility TA-9-28 Heavy Equipment Maintenance (Sector P)

Qualified for a "No Exposure" exclusion on 8/6/2015

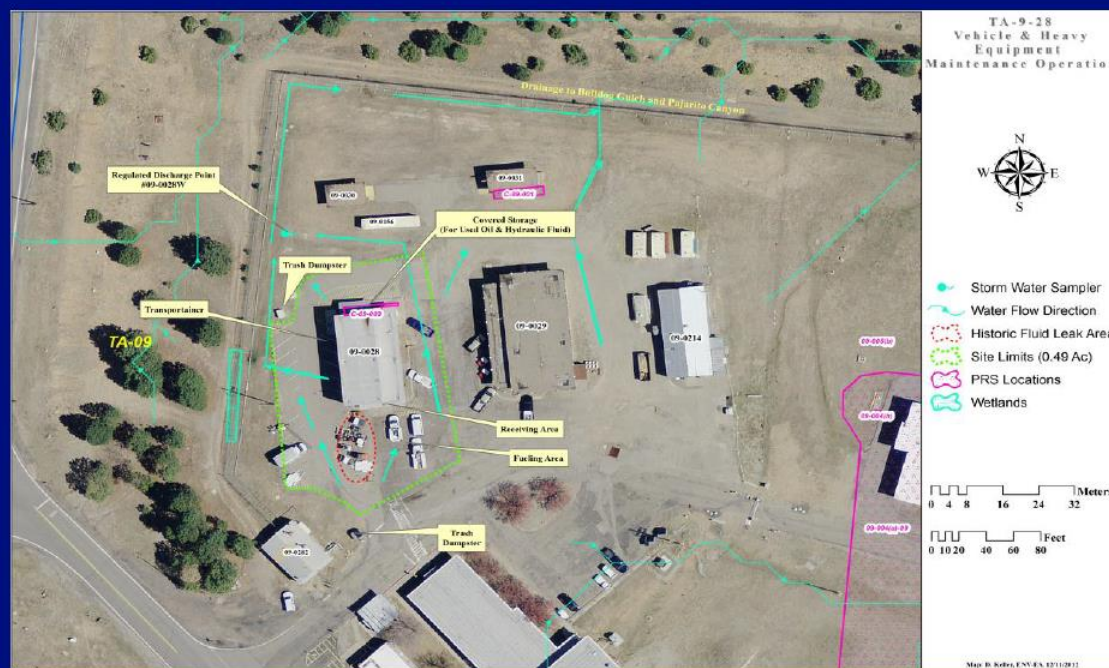


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TA-9-28 Map



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Industrial Pollutant Sources at TA-9-28

Identified industrial activities and associated pollutants are identified include the following:

- Hydraulic hose leaks, oil, transmission fluid, diesel or gasoline spills from vehicles and equipment
 - Any leaks or spills must be cleaned up immediately
 - All leaks or spills (except allowable discharges) must be entered into the EPC-CP Corrective Action Reporting Database
 - Spills result in the following environmental issues
 - ✱ May affect surface or ground water quality
 - ✱ May affect stormwater quality
 - Will require corrective actions and may result in waste generation
 - May require external reporting



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Industrial Pollutant Sources at TA-9-28 (continued)

- Equipment and vehicle maintenance
 - Chlorinated solvents, oil, hydraulic and transmission fluid, grease, heavy metals, acid/alkaline wastes, ethylene glycol
- Outdoor vehicle and equipment storage and parking
 - Oil, hydraulic fluid, heavy metals, organics, fuel
- Painting areas
 - Paint, spent chlorinated solvents
- Liquid and chemical storage
 - Oil, grease, hydraulic and transmission fluid, heavy metals, fuel, paint, materials being stored and salt



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Industrial Pollutant Sources at TA-9-28 (continued)

- Loading and unloading
 - Oil, grease, hydraulic and transmission fluid, heavy metals, fuel, and materials being stored
- Waste storage
 - Oil, grease, hydraulic and transmission fluid, heavy metals, organics, fuel, scrap metal, and contaminated stormwater from uncovered bins



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Industrial Pollutant Sources at TA-9-28 (continued)

- Metal, debris, and solid waste storage
- Surface erosion of sediment/dirt/soil



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Industrial Pollutant Source at TA-9-28



Generator, tractors and a mower can release fluids like oil, gasoline and diesel.



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Industrial Pollutant Source at TA-9-28 (continued)



Open solid waste dumpster can release garbage causing poor housekeeping issues or accumulate precipitation resulting in a release of contaminated stormwater from contact with waste.



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Industrial Pollutant Source at TA-9-28 (continued)



This used oil storage area is a pollutant source. The cover is a control measure to minimize its exposure to stormwater.



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Industrial Facility TA-14-23 OBOD (Sector K)

- TA-14-23 was a burn cage
 - Originally qualified for a “No Exposure” exclusion on 04/07/2011
 - The burn cage has been removed.
 - EPC-CP will conduct an inspection annually until RCRA certified closure is complete.



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Industrial Pollutant Source at TA-14-23(continued)



Burn cage area



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Industrial Pollutant Sources at TA-14-23

- Surface erosion of sediment/dirt/soil
- Potential housekeeping issues



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Industrial Facility TA-15-313 RSL Machine Shop (Sector AA)

- TA-15-313
 - Qualified for a “No Exposure” exclusion on 1/3/2018



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Industrial Facility TA-15-313 RSL Machine Shop (Sector AA)



Covered Roll off Bins and Morgan Shed



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Industrial Pollutant Sources at TA-15-313

- Waste storage
 - Oil, grease, hydraulic and transmission fluid, heavy metals, organics, fuel, scrap metal, and contaminated stormwater from uncovered bins
- Surface erosion of sediment/dirt/soil
- Potential housekeeping issues



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Industrial Facility TA-22-52 Machine Shop (Sector AA)

- TA-22-52
 - Qualified for a “No Exposure” exclusion on 1/3/2018



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Industrial Facility TA-22-52 Machine Shop (Sector AA)



Covered Roll off Bin



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Industrial Pollutant Sources at TA-22-52

- Waste storage
 - Oil, grease, hydraulic and transmission fluid, heavy metals, organics, fuel, scrap metal, and contaminated stormwater from uncovered bins
- Surface erosion of sediment/dirt/soil
- Potential housekeeping issues



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What is a Control Measure?

- Maintenance and operating procedures and practices to control site runoff, spillage or leaks, or drainage from raw material storage, to prevent pollutants from coming into contact with waters of the U.S.
 - Waters of the U.S. are defined as follows:
 - All canyons, tributaries to canyons, dry arroyos, or other land features that convey stormwater.



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Potential Control Measures

- Cover all dumpsters and bins (i.e., garbage, metal recycle, etc.)
- Store product, material, and equipment inside a building/shed (to the extent possible)
- Store leaking vehicles and equipment inside a building
- If a leak is found
 - Identify leak location and isolate leak source , if practicable
 - Absorb spilled material (i.e., diesel, gasoline, oil, etc.) to the extent possible
 - Notify the Deployed Environmental Professional (Kelkenny Bileen – 699-0440) and EPC-CP (664-7722) of any spills that occur.
 - Call SEO-1 (Emergency Response-667-2400) in the event of an emergency
 - If the leak or spill is to soil, dig up and containerize the spill residue
 - Report all spills promptly
- Store liquids on secondary containment



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Potential Control Measures (continued)

- Clean up debris and get rid of old equipment, wood, metal etc.
 - Salvage old equipment
 - Store metal in a covered container or roll-off bin and ensure shavings or small metal pieces are contained so they don't migrate out the joints of the bin
- Confine loading/unloading to designated areas away from outfalls and stormwater controls (BMPs)
- Load/unload indoors, or in a covered area
- Avoid loading/unloading in the rain
- Inspect loading/unloading area for problems before they occur
- Submit a Facility Service Request for routine clean-up at the site
 - Pick up debris/trash/metal weekly or monthly



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Control Measure



This vegetative swale prevents erosion and channels stormwater.



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Control Measure



Liquid product stored on secondary containment.



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Example Control Measure



Covered oil and product storage area and transportainer protect product and waste from coming in contact with precipitation.



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Example Control Measure



Rock berm and run down directs stormwater flow and prevents erosion.



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Inspections

- Inspections are conducted once annually
 - Walk downs can occur anytime to ensure “No Exposure” requirements are met
- Inspections may identify conditions that require corrective actions
 - Inspectors identified in the SWPPP shall be trained to *EPC-CP-QP-022: MSGP Stormwater Corrective Actions*
 - Contains specific information about how to identify and document corrective actions



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What Triggers a Corrective Action?

- **Spills**
- Benchmark/background or water quality standard exceedance
- **Improperly installed or maintained control measures**
- Process or operational changes



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Corrective Actions

- Identification of an issue either during routine operations or during an inspection
 - Notify the Deployed Environmental Professional
 - Record the issue and corrective action
 - Enter the issue into the MSGP Corrective Action Reporting (CAR) Database
 - Propose a completion date
 - Follow-up and completion of corrective action
 - Perform work and record completion date in the database
 - Send e-mails to the following personnel every 7 days until corrective actions are closed
 - ✧ FOD
 - ✧ Operations Manager
 - ✧ Deployed Environmental Professional



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What Happens If No Action Is Taken?

BNSF Agrees To Pay \$1.5 Million

BNSF Railway Co. agreed to pay \$1.5 million for Puget Sound restoration projects to resolve a lawsuit over storm water pollution at its Seattle facility.

The Puget Soundkeeper Alliance sued BNSF in 2009, alleging it violated federal clean-water laws with storm water discharges from its Balmer Yard facility.

Last August, U.S. District Court Judge John Coughenour found BNSF responsible for numerous federal clean-water violations at the facility. The settlement is one of the largest involving citizen actions taken under the federal Clean Water Act involving storm water pollution, Chris Wilke, executive director of the alliance, said.

The consent decree notes that BNSF has taken major steps to control storm water pollution from the Balmer Yard facility, including developing a prevention plan, coating roofs to minimize zinc pollution, covering trash bins and minimizing soil erosion.



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Reporting

- EPC-CP handles all reporting to EPA
 - Annual Report
 - Discharge Monitoring Reports
 - Planned physical alterations and additions to the facility that qualify it as a new source
 - Spills that exceed reportable quantities
 - Non-compliances requiring reporting
 - Correction of any previously submitted information that was in error



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Reporting (continued)

- Deployed Environmental Professionals
 - Enter issues and corrective actions into the MSGP Corrective Action Reporting Database



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TA-15-185 (Phermex) Sampler

Phermex site became inactive on
September 17, 2012.

Permit documentation and the
SWPPP must be retained but
monitoring and routine inspections
have ceased.

Annual inspection is required.

Stormwater controls must be
maintained.



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Environmental Contact Information

- MSGP stormwater issues:
 - Holly Wheeler, 667-1312 or hbenson@lanl.gov
 - Kelkenny Bileen, 665-9306 or kbileen@lanl.gov
- Environmental issues associated with WFO-FOD
 - Kelkenny Bileen, 665-9306 or kbileen@lanl.gov
- Spills
 - Steven G. Pearson, 667-3005 or spearson@lanl.gov
 - EPC-CP Spills Pager – 664-7722
- Waste Management assistance
 - Robert Houdashelt, 665-8208, 500-2972 or rhoud@lanl.gov



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Other Contacts

- William Foley (Primary contact) EPC-CP Team Leader
 - 665-8423
- John Branch (WFO Operations Manager)
 - 667-2688

